

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 21 CR 279
v.)	
)	Hon. Franklin U. Valderrama
PATRICK THOMPSON,)	
)	
Defendant.)	

DEFENDANT’S MOTION FOR ADDITIONAL VOIR DIRE INQUIRY

The defense advises the Court that based on an email inquiry from a reporter for the Chicago Tribune, it is likely that the paper will run a story on the morning of the first day of trial of this case concerning the case. It is also possible based on historical precedent that the Chicago Sun Times and other outlets, including radio stations, will carry stories that day. In order to avoid unfair prejudice, the defense respectfully requests that the Court inquire as follows:

“Have you read, seen or heard any press accounts about this case?”

“Without telling me what they are, can you tell me if you have formed any opinions about the case based on those press accounts?”

“Would what you have read, seen or heard make it difficult for you to be fair and impartial to both sides and to decide the case solely based on the evidence you hear in the courtroom?”

Dated: February 3, 2022

Respectfully submitted,

/s/ Chris Gair

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CERTIFICATE OF SERVICE

The undersigned certifies that on February 3, 2022, he caused a copy of the foregoing document to be filed via this Court's CM/ECF system which will provide service on all Parties of record.

/s/ Chris Gair
Chris Gair